

David E. Patton  
Executive Director

Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge

August 27, 2021

***VIA ECF***

The Honorable John P. Cronan  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

Re: ***United States v. Jamel Hamilton,***  
**21 Cr. 396 (JPC)**

Honorable Judge Cronon:

With the consent of the Government, I write on behalf of my client, Jamel Hamilton, to respectfully request that the Court set conditions for his release pending sentencing, currently scheduled for Thursday, September 9, 2021 at 11:00 A.M. This request is necessitated by the unexpected death of Mr. Hamilton's brother, who died suddenly last Sunday, August 22, 2021 and whose funeral will take place on Saturday, September 4, 2021 at 10:00 A.M.

Mr. Hamilton has been detained at the Essex County Correctional Center in Newark, New Jersey since his arrest on May 11, 2021. He is pending sentencing following his admission to one count of violating Title 18 United States Code §§ 751(a) and 4082(a), and the applicable Guidelines range is between 8 and 14 months, which is in Zone B.

Given this relatively low sentencing range, the limited duration of any presentence release, and the profound significance to Mr. Hamilton and his loved ones to be united in their grief, I respectfully request that, in addition to any conditions the Court deems appropriate, the Court release Mr. Hamilton pursuant to a \$50,000 personal recognizance bond, cosigned by one financially responsible person; pretrial supervision as directed; travel restricted to the Southern and Eastern Districts of New York; surrender of any passport, and a prohibition against any new application pending sentencing.

Mr. Hamilton is well aware that he must return to court to be sentenced, and has every reason to do so. Aside from the potential for a sentence of time-served, the Court may determine that a sentence of home confinement is appropriate, which, notably, would be compliant with the advisory Guidelines. In light of the substantial punishment Mr. Hamilton has already served, his strong incentive to return as directed, and the reasons

discussed above, there is clear and convincing evidence for the Court to find that Mr. Hamilton is not a flight risk or a danger pursuant to 18 U.S.C. § 3143(a).

I have discussed this request with Assistant United States Attorney Patrick Maroney, who graciously consents on behalf of the Government.

Thank you for considering this request.

Respectfully Submitted,

/s/

Christopher A. Flood

Federal Defenders of New York


Counsel for Mr. Jamel Hamilton

cc: AUSA Patrick Maroney, Esq. (ECF)

Defendant Jamel Hamilton's request is granted. Mr. Hamilton shall be released pending sentencing pursuant to a \$50,000 personal recognizance bond, cosigned by one financially responsible person. Mr. Hamilton shall comply with any directives from Pretrial Services. Mr. Hamilton must surrender any passport, may only travel within the Southern and Eastern Districts of New York, and may not make any new applications pending sentencing. The Court extends its condolences to Mr. Hamilton on his brother's passing.

SO ORDERED.

Date: August 30, 2021  
New York, New York

  
JOHN P. CRONAN  
United States District Judge